

Safety Evaluation Number<sup>1</sup>: SE-W375-00-00004Revision No: 0ABCN Number: ABCN-W375-00-00004Safety Evaluation Subject: Modification of the SRD Criteria 8.0, Deactivation and Decommissioning**PART I: DESCRIPTION OF THE PROPOSED REVISION, BACKGROUND, AND SCHEDULE**

1. Describe the proposed revision (including credible failure modes, if applicable).

The Safety Requirements Document (SRD) currently references the Integrated Safety Management Program (ISMP) Section 1.3.19 as the implementing standard for deactivation and decommissioning considerations. This change deletes the ISMP Section 1.3.19 reference from SRD Criterion 8.0 – 1 and – 2 Implementing Codes and Standards and includes this information into a new appendix to the SRD as an ad hoc standard. (Minor refinements to the ad hoc standard make the implementing standard clearer as to how the intent of the safety criteria will be met.) DOE/RL-96-0006, paragraph 4.2.3.4, Radiation Protection-Deactivation Plan, of the SRD Criterion 8.0 – 1 Regulatory Basis, is being deleted to correspond to Revision 1 to DOE/RL-96-0006 that deleted this paragraph. Also, G-10 CFR835/B2, Occupational ALARA Program, Rev. 1, is added as a new implementing standard to SRD Criterion 8.0 – 2.

2. Identify the affected Authorization Basis (AB) documents and perform a comparison and assessment of the revision against the AB.

The Safety Requirements Document (BNFL-5193-SRD-01) is the authorization basis document impacted by this change. The ISMP implementing standard citation for deactivation and decommissioning in the SRD Safety Criteria 8.0 – 1 and – 2 is being replaced by citation directing the reader to equivalent ISMP information in a new ad hoc standard in an SRD appendix. The new SRD appendix contains the equivalent information as the original ISMP citation with minor revisions to improve clarity. The reference to DOE/RL-96-0006, paragraph 4.2.3.4 in the Regulatory Basis section of Safety Criterion 8.0 – 1 was deleted to be consistent with Revision 1 of the affected – 0006 Regulatory Unit document that deleted this paragraph. In addition, G-10 CFR835/B2 was added as an implementing standard to Criterion 8.0 – 2 to improve guidance.

An Attachment 1 comparison of the deleted ISMP section with the new ad hoc standard demonstrates this change is merely a transfer of the requirements within the SRD thereby not reducing the requirements.

The new appendix was reviewed against RL/REG-98-20 to ensure that requirements placed on BNFL by the RU for developing implementing standards for selected topics were incorporated. This review found no open items regarding deactivation and decommissioning to be considered.

Based on the above discussion of the evaluation performed in comparison of the ISMP and safety criteria with the new appendix, it is concluded that the change does not:

- modify the requirements of the implementing standards as identified in the SRD
  - represent a reduction in commitment contained in the authorization basis, or
- represent a reduction in the effectiveness of any program, plan or procedure contained in the authorization basis.

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<sup>1</sup> The Safety Evaluation Number shall be obtained from Project Document Control.

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## 3. List the references used for the safety evaluation.

- BNFL-5193-SRD-01, Revision 2e, TWRS-P Project Safety Requirements Document, Volume II, Safety Criteria 8.0 - 1 and 8.0 - 2.
- DOE/RL-96-0006, Revision 1, Top-Level Radiological, Nuclear, And Process Safety Standards And Principles For TWRS Privatization Contractors
- RL/REG-97-13, Revision 5, Regulatory Unit Position on Contractor-Initiated Changes to the Authorization Basis
- BNFL-5193-ISP-01, Revision 4b, TWRS-P Integrated Safety Management Plan
- Commitment List dated September 29, 1999
- DOE/RL-98-20, Rev. 1, DOE Regulatory Unit Evaluation of BNFL Inc. Safety Requirements Document

## 4. Describe the planned revision implementation schedule.

The changes to the SRD will be incorporated within 30 days of RU approval of the authorization basis change request. No other changes to procedures or plans have been identified to implement this change request.

**PART II: REGULATORY IMPACT OF PROPOSED AB REVISION**

The following questions are to be answered as part of the safety evaluation, to determine if the proposed AB revision (and the proposed initiating change if applicable) requires prior RU approval.

- |   | <u>YES</u>                          | <u>NO</u>                |
|---|-------------------------------------|--------------------------|
| 1. Does the revision involve the deletion or modification of a standard previously identified or established in the approved SRD? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

## JUSTIFICATION:

**As discussed above, the change does modify a standard in that it replaces a reference to ISMP Section 1.3.19 as the implementing standard for safety criteria 8.0 - 1 and -2 with a reference to a new appendix to be contained in the SRD. The requirements contained in the ISMP have been moved into a new SRD appendix. A comparison of the ISMP sections with the new appendix in Attachment 1 demonstrates that there is no reduction to the actual requirements. Reference to the DOE-deleted DOE/RL Regulatory Basis reference DOE/RL-0006, paragraph 4.2.3.4, is deleted from the SRD Criterion 8.0 -1. The addition of G-10 CFR835/B2 as an implementing standard for Criterion 8.0 - 2 expands the guidance for design features for eventual deactivation and decommissioning.**

- |   |                          |                                     |
|---|--------------------------|-------------------------------------|
| 2. Does the revision result in a reduction in commitment currently described in the AB? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|-------------------------------------|

## JUSTIFICATION:

**The implementing standard for safety criteria is being moved into a new appendix in the**

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YES      NO

**SRD and a DOE-deleted reference is being deleted from the SRD Criterion 8.0 - 1.**

**An Attachment 1 comparison of the requirements contained within the ISMP shows that the applicable portions of the ISMP have been included in the new appendix. Therefore, the change does not result in a reduction in commitment currently described in the AB.**

3. Does the revision result in a reduction in the effectiveness of any program, procedure, or plan described in the AB. ☐ ☒

JUSTIFICATION:

**As discussed in II.2 above, it is concluded that the revision involving the movement of requirements from the SRD Chapter to an appendix of the SRD does not result in a reduction in the effectiveness of any program, procedure, or plan described in the AB..**

Note: Guidance on defining the terms and responding to the above questions is provided in K70C528, Code of Practice for Managing Changes to the Authorization Basis, Appendix 6.

If all the answers to the above questions are no, then the change can be made without prior RU approval.

If any of the above answers is yes, then RU approval is required prior to implementation of the AB revision (and the initiating change if applicable). An ABAR shall be prepared to obtain RU approval (see K70C528, Appendix 7.)

### **PART III: SAFETY EVALUATION CONCLUSION**

- ☐ All PART II questions are answered No. Therefore, RU approval is NOT required prior to implementing the proposed AB revision (and initiating change where applicable).
- ☒ At least one PART II question is answered Yes. Therefore, RU approval IS required prior to implementing the proposed AB revision (and initiating change where applicable). Issuance of an ABAR is required to obtain RU approval.

\_\_\_\_\_  
Evaluator/Originator

\_\_\_\_\_  
Date

\_\_\_\_\_  
Reviewer<sup>2</sup>

\_\_\_\_\_  
Date

\_\_\_\_\_  
Radiation Safety and Regulatory Manager

\_\_\_\_\_  
Date

<sup>2</sup> The reviewer should be a person from the same department as the Evaluator/Originator and at least as qualified as the Evaluator/Originator to conduct safety evaluations.

# Safety Evaluation

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Chair, Project Safety Committee<sup>3</sup>

Date

RPP-WTP General Manager<sup>3</sup>

Date

<sup>3</sup> This signature required if Safety Evaluation concludes AB change can be made without RU prior approval. If RU approval (ABAR) is required, PSC and GM signatures occur on the ABAR.